



APCO International

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS INTERNATIONAL, INC.

April 15, 2005

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The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket 04-36

Dear Mr. Chairman:

We are writing in response to an ex parte letter submitted by Vonage Holdings Corp (“Vonage”) on April 7, 2005, in the above-referenced proceeding. While there is much in the letter with which we disagree, we are particularly offended by Vonage’s extraordinary suggestion that the nation’s Public Safety Answering Points (“PSAPs”) be “forced” to alter their operations and accept VoIP emergency calls through their ten-digit administrative numbers, rather than through the universal three-digit number that the Congress, the FCC, and the public have designated as THE emergency phone number: “9-1-1.” Ironically, Vonage’s proposal would be a giant step backwards, taking a 21st century technology (IP telephony) and forcing it into a 1960s method of reporting life-threatening emergencies.

APCO has consistently warned against routing emergency VoIP calls to PSAPs’ ten-digit administrative numbers. While perhaps acceptable for some PSAPs, such an approach could endanger the public and disrupt already over-burdened PSAP operations. In many cases, PSAP administrative numbers are answered by low-level clerical staff, not by trained public safety telecommunicators operating from state-of-the-art consoles. Indeed, administrative numbers are often “answered” by voice-mail, especially during “non-business” hours. A common message to the caller is: “if this is an emergency, please hang up and dial 9-1-1.”

The rapid expansion of VoIP services will create substantial staff and financial burdens on PSAPs if they must adapt their operations to accommodate VoIP. Such burdens are especially hard to accept when the VoIP callers are not paying subscriber fees that fund PSAP operations.

Therefore, we firmly believe that the burden of providing VoIP customers with emergency services must be the reverse of what Vonage suggests. If VoIP providers want to compete in the marketplace, they

should adapt their system design and operations to provide their customers with full access to existing Enhanced 9-1-1 capability. PSAPs simply lack the resources to be constantly upgrading and modifying their operations to be compatible with the latest technological fads.

Sincerely,

A handwritten signature in black ink that reads "Gregory A. Ballentine". The signature is written in a cursive, flowing style.

Gregory Ballentine

cc: Commissioner Kathleen Abernathy
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Thomas Navin, FCC, Wireline Competition Bureau
Michelle Carey, FCC, Wireline Competition Bureau
Terri Natoli, FCC, Wireline Competition Bureau
Julie Veach, FCC, Wireline Competition Bureau
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